

1 The Honorable Marsha J. Pechman
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 RENALDO WHITE and RANDOLPH NADEAU,) CASE NO. 2:20-CV-01866-MJP
10 individually and on behalf of all others similarly)
situuated,)
11 Plaintiffs,) STIPULATED MOTION AND
12 v.) PROPOSED ORDER EXTENDING
13 SYMETRA ASSIGNED BENEFITS SERVICE) CLASS CERTIFICATION
COMPANY and SYMETRA LIFE INSURANCE) DEADLINE
14 COMPANY,)
15 Defendants.)
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17 The parties, by and through their counsel, hereby submit the following stipulated motion
18 and respectfully request the Court's approval to adjust the schedule for completion of class
19 certification discovery. The parties previously requested an extension on September 8, 2021, Dkt.
20 51, which was granted by this Court's September 9, 2021 Order, Dkt. 52. Plaintiffs' Motion for
21 Class Certification is presently due on November 12, 2021.

22 Since that time, the parties have been working diligently to complete class certification
23 discovery, most recently electronic discovery relating to Plaintiffs' discovery requests. Defendants
24 produced 18,557 pages of electronic documents on October 8 and expect to produce additional
25 electronic documents this week, and further expect another significant volume for the remaining
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electronic documents, which are anticipated to be ready for production by November 2. Defendants expect to complete their production by November 5, 2021.

The requested extensions are supported by good cause. The extensions are necessary to permit the completion of Defendants' ESI productions, which may be relevant to class certification and, in turn, to provide Plaintiffs with an opportunity to review the same prior to seeking certification of the class. The requested extensions will not interfere with other deadlines in this case.

Therefore, the parties agree and request that the Court extend the current class certification discovery deadline to November 5, 2021. The parties propose the following briefing schedule for Plaintiffs' Motion for Class Certification and respectfully request that the Court enter the same:

- December 10, 2021: Plaintiffs' Motion for Class Certification
- January 14, 2022: Defendants' Opposition
- February 4, 2022: Plaintiffs' Reply

Respectfully submitted this 14th day of October, 2021.

KELLER ROHRBACK L.L.P.

KARR TUTTLE CAMPBELL

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STIPULATED MOTION AND ORDER EXTENDING
CLASS CERTIFICATION DEADLINE - [2](#)
CASE NO. 3:20-CV-005268
#5053610 v1 / 42726-394

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22 *Attorneys for Plaintiffs*

23 ORDER

24 IT IS SO ORDERED. The deadline for class action discovery is extended to November 5,
25 2021. The briefing schedule for Plaintiffs' Motion for Class Certification is as follows:

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- 27 • December 10, 2021: Plaintiffs' Motion for Class Certification
- January 14, 2022: Defendants' Opposition
- February 4, 2022: Plaintiffs' Reply

28 Dated this 18th day of October, 2021.

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31 Marsha J. Pechman
32 United States District Judge

CERTIFICATE OF SERVICE

I, Jan Likit, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is: 701 Fifth Ave., Suite 3300, Seattle, WA 98101. On this day, I caused a true and correct copy of the foregoing document to be filed with the Court electronically. I caused the same to be served on the parties listed below in the manner indicated.

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Via Hand Delivery
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CM/ECF via court's website

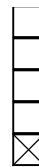
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7 I declare under penalty of perjury under the laws of the State of Washington that the
8 foregoing is true and correct, to the best of my knowledge.

9 Executed on this 12th day of March, 2021, at Seattle, Washington.

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Jan Likit
12 Litigation Legal Assistant
4813-4640-4351, v. 1
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STIPULATED MOTION AND ORDER EXTENDING
CLASS CERTIFICATION DEADLINE - **5**
CASE NO. 3:20-CV-005268
#5053610 v1 / 42726-394

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